

THE LAW OFFICES OF OMID NOSRATI
1875 CENTURY PARK EAST, 6TH FLOOR, L.A., CA 90067

THE LAW OFFICE OF OMID NOSRATI
Omid Nosrati, Esq. (SBN 216350)
Tatiana Toroyan, Esq. (SBN 298970)
Stephanie Hernandez, Esq. (SBN 311739)
1875 Century Park East, 6th Floor
Los Angeles, California 90067
Telephone: (310) 553-5630
Facsimile: (310) 553-5691
Email: omid@nosratilaw.com
Email: tatiana@nosratilaw.com
Email: stephanie@nosratilaw.com

Attorneys for Plaintiff,
ASTIN HENRY

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA – WESTERN DIVISION

ASTIN HENRY, an Individual;

Plaintiff,

vs.

NATIONAL OIL WELL VARCO, L.P., a
foreign Limited Partnership; DNOW, L.P.,
a foreign Limited Partnership; KAY
WILBANKS, an Individual; and DOES 1
through 25, inclusive,

Defendants.

Case No.: 2:17-CV-00815-JFW (GJSx)

{ Assigned for all purposes to the
Honorable John F. Walter, Courtroom 7A }

**STIPULATION FOR DISMISSAL
WITH PREJUDICE OF ENTIRE
ACTION PURSUANT TO FEDERAL
RULE OF CIVIL PROCEDURE
41(a)(1)**

Complaint Filed: December 9, 2016
Trial Date: December 19, 2017

PLEASE TAKE NOTICE that pursuant to Federal Rule of Civil Procedure 41(a)(1), Plaintiff ASTIN HENRY (“Plaintiff”), and Defendants, DNOW, L.P. and KAY WILBANKS have resolved this matter and therefore stipulate to dismiss all claims in this action *with prejudice*. Each party is responsible for their own attorney’s fees and costs.

Federal Rule of Civil Procedure 41(a)(1) provides, in relevant part as follows:

“(a) Voluntary Dismissal.

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1 (1) By the Plaintiff.

2 (A) Without a Court Order. Subject to Rules 23(e), 23.1(c), 23.2, and 66 and
3 any applicable federal statute, the plaintiff may dismiss an action without a
4 court order by filing:

5 (i) a notice of dismissal before the opposing party serves either an
6 answer or a motion for summary judgment; or

7 (ii) a stipulation of dismissal signed by all parties who have appeared.”

8 The parties agree that the Court retains jurisdiction in order to enforce the terms
9 of the settlement.


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11 Dated: June 30, 2017

12 THE LAW OFFICE OF OMID
13 NOSRATI

14 By: /s/ Omid Nosrati
15 OMID NOSRATI
16 Attorney for Plaintiff,
17 ASTIN HENRY

18 Dated: August 7, 2017

19 OGLETREE, DEAKINS, NASH,
20 SMOAK & STEWART, P.C.

21 By: 
22 CHRISTIAN J. KEENEY
23 JENNIFER YANNI
24 Attorneys for Defendants,
25 DNOW, L.P. and KAY WILBANKS
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